

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re Chapter 9

CITY OF DETROIT, MICHIGAN, Case No. 13-53846

Debtor Hon. Steven W. Rhodes

CARLA D. AIKENS, P.C.
Carla D. Aikens, (P69530)
Attorney for Plaintiffs
P.O. Box 6062
Vernon Hills, IL 60061
(215) 219-7404

FOLEY & LARDNER LLP
John A. Simon
Tamar N. Colcourt
Attorney for Debtor
500 Woodward Ave.
Suite 2700
Detroit, MI

FILED
2014 SEP 23 P 4:57
U.S. BANKRUPTCY COURT
E.D. MICHIGAN - DETROIT
CLERK

**EX PARTE MOTION FOR LEAVE
TO FILE PLEADING IN PAPER FORM**

NOW COMES Claimant, REGINALD WILSON, by and through his attorney, Carla D. Aikens, P.C. and for his Motion for Leave to File Pleading in Paper Form, states as follows:

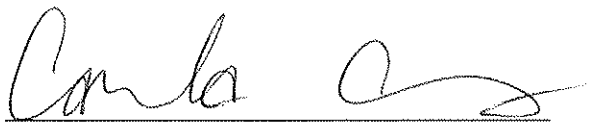
1. Claimant has a verified claim against the Debtor pursuant to Wayne County Circuit Court Case No. 13-004272-NF.
2. On August 29, 2014, Debtor filed Debtor's Sixth Omnibus Objection to Certain Claims (Late-Filed Claims). Filed therewith was Notice of Debtor's Sixth Omnibus Objection to Certain Claims (Late-Filed Claims), which included the instruction for filing objections, giving a filing deadline of September 24, 2014, and stating that: "All Attorneys are required to file pleadings electronically"
3. In compliance with the Notice of Debtor's Sixth Omnibus Objection to Certain Claims (Late-Filed Claims) on September 18, Claimant's Attorney obtained a

CM/ECF account in order to file Claimant's Objection to Debtor's Sixth Omnibus Objection to Certain Claims (Late-Filed Claims).

4. Claimant's Attorney was given a Creditor's login rather than Attorney's login to the Bankruptcy Court's CM/ECF electronic filing portal, and was informed that no Attorney training is scheduled until Thursday, October 2, 2014, such date being after the filing deadline for Claimant's Response to Debtor's Sixth Omnibus Objection to Certain Claims (Late-Filed Claims).
5. Because Claimant's Attorney cannot timely file Claimant's Response in electronic form, Claimant respectfully requests that this Court grant Claimant leave to file its Response on paper until such time as Plaintiff's Attorney may obtain the necessary Attorney CM/ECF login and password.

WHEREFORE Claimant respectfully requests that this Court grant Claimant leave to file its Response to Debtor's Sixth Omnibus Objection to Certain Claims (Late-Filed Claims) in paper form, and grant any further relief it deems fair and equitable.

Respectfully Submitted,




Carla D. Aikens (P69530)
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Dated this 19th day of September, 2014

Certificate of Service

The undersigned certifies that a copy of the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein by mail on September 22, 2014, by:



Carla D. Aikens

Exhibit A

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

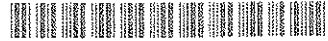
-----X
: Chapter 9
In re :
: Case No. 13-53846
CITY OF DETROIT, MICHIGAN, :
: Hon. Steven W. Rhodes
Debtor :
-----X

NOTICE OF DEBTOR'S SIXTH OMNIBUS OBJECTION TO CERTAIN CLAIMS
(Late-filed Claims)

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS
HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR
CLAIM(S).

PLEASE TAKE NOTICE THAT the Debtor, the City of Detroit, (the "City"), by and
through its undersigned counsel, has filed an objection to certain late-filed claims (the "Sixth
Omnibus Objection") and for an order disallowing and expunging such claims.

YOUR CLAIM MAY BE REDUCED, MODIFIED OR ELIMINATED.
PURSUANT TO FED. R. BANKR. P 3007(e)(1), YOU SHOULD REVIEW EXHIBIT 2 OF
THE SIXTH OMNIBUS OBJECTION TO FIND YOUR NAME AND CLAIM. YOU
SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR
ATTORNEY, IF YOU HAVE ONE.



If you do not want the court to eliminate or change your claim, or grant the relief request in the Sixth Omnibus Objection, then on or before September 24, 2014, you or your lawyer must:

1. File with the court, at the address below, a written response to the objection. Unless a written response is filed and served by the date specified, the court may decide that you do not oppose the objection to your claim.

Clerk of the Court
United States Bankruptcy Court
211 W. Fort Street, Suite 2100
Detroit, MI 48226

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above. All attorneys are required to file pleadings electronically.

2. A copy of your response must also be mailed to counsel for the City.

John A. Simon
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Foley & Lardner LLP
500 Woodward Ave., Ste. 2700
Detroit, MI 48226

3. You must also attend the hearing on the objection scheduled to be held on October 1, 2014 at 10:00 a.m. in Courtroom 716, Theodore Levin Courthouse, 231 W. Lafayette, Detroit, MI 48226 unless your attendance is excused by mutual agreement between yourself and the objector's attorney.

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim, in which event the hearing will be canceled and the objection sustained.

Date: August 29, 2014

FOLEY & LARDNER LLP

By: /s/ Tamar N. Dolcourt
John A. Simon (P61866)